

**Exhibit A**

**Definitions**

1. “Defendant” refers to Apple.
2. “Patents-In-Suit” are those patents that Plaintiff has alleged Defendant to infringe in the Complaint in this case.
3. The term “Accused Products” include but are not limited to products sold under the names MacBook, MacBook Pro, MacBook Air, iMac, Mac mini, and Mac Pro.

**Topics**

1. The design and functionality of the power management features of the Accused Products, including:
  - a. the various power level modes of the Accused Products;
  - b. how the Accused Products determine when to enter the various power level modes;
  - c. the software and hardware components involved in determining when to transition between various power level modes of the Accused Products;
  - d. the interrelationship and functionality of the software and hardware components involved in transitioning the Accused Products between the various power level modes;
  - e. the functionality and interrelationship of components and elements identified as being present in the Accused Products in Plaintiff’s Preliminary Infringement Contentions concerning the ‘025, ‘175, ‘929, and ‘959 patents (the “Fung Patents”); and
  - f. documents illustrating the interrelationship and functionality of the software and hardware components involved in transitioning the Accused Products between the various power level modes.
2. The design and functionality of the Accused Products with respect to applying different voltage levels to an Express Card that is plugged into a computer system, including:
  - a. the method(s) used to select and apply different voltage levels to an Express Card that is plugged into a computer system;
  - b. the hardware associated with the function of selecting and applying different voltage levels to an Express Card that is plugged into a computer system;
  - c. the functionality and interrelationship of components and elements identified as being present in the Accused Products in Plaintiff’s Preliminary Infringement Contentions concerning the ‘130 patent (the “Teng Patent”); and

- d. documents illustrating the interrelationship and functionality of the hardware components involved in selecting and applying different voltage levels to an Express Card that is plugged into a computer system.
3. The design and functionality of the Accused Products with respect to generation of output data based upon compressed input data and/or uncompressed input data, depending upon how recently the uncompressed input data has been updated, including:
  - a. the functionality of the Intel 945/965 Express Chipset Family in the Accused Products;
  - b. the manner in which output data to a video display is generated from compressed and/or uncompressed input data in the Accused Products;
  - c. hardware and/or software used to selectively generate output display data on compressed and/or uncompressed data based upon how recently the input data has been updated;
  - d. the hardware associated with the function of generating output data to display on a video monitor from compressed and/or uncompressed input data in the Accused Products;
  - e. the functionality and interrelationship of components and elements identified as being present in the Accused Products in Plaintiff's Preliminary Infringement Contentions concerning the '617 patent (the "Tsang Patent"); and
  - f. documents illustrating the interrelationship and functionality of the hardware components involved in generating output display data from compressed and/or uncompressed input data.
4. The design and functionality of the Accused Products with respect to the use of a single common bus and multiple special purpose buses to connect a processor to various external devices, including:
  - a. the functionality and interrelationship of the Mobile Intel 4 Series Express Chipset Family and PCI Express interface of the Accused Products;
  - b. the data communication pathways between external devices connected to a computer system and a processor in the computer system of the Accused Products;
  - c. the functionality and interrelationship of components and elements identified as being present in the Accused Products in Plaintiff's Preliminary Infringement Contentions concerning the '163 patent (the "Fung/Tsang Patent"); and
  - d. documents illustrating the interrelationship and functionality of the hardware components involved in communicating data between a processor in a computer system and an external device in communication with the computer system of the Accused Products.
5. The bases, if any, for Defendant's position that it does not infringe the Patents-In-Suit.